

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

H-1 AUTO CARE, LLC,

Plaintiff,

v.

BALHAR LASHER, EKTA LASHER,
SQUARE-1 AUTO CARE, INC., AAA
AUTO CARE, INC., FLEMINGTON AUTO
CARE INC, HAMILTON AUTO CARE INC,
JOSE BRAVO, and SCOTT JAEGER,

Defendants.

Case No.: 3:21-cv-18110-ZNQ-
TJB

JOINT MOTION TO ENLARGE SCHEDULING ORDER DEADLINES

Plaintiff H-1 AUTO CARE, LLC (“H1”) and Defendants BALHAR LASHER, EKTA LASHER, SQUARE-1 AUTO CARE, INC. (“Square-1”), AAA AUTO CARE, INC. (“AAA”), FLEMINGTON AUTO CARE INC, HAMILTON AUTO CARE INC, JOSE BRAVO, and SCOTT JAEGER (collectively “Defendants”), jointly submit this Motion to Enlarge the Scheduling Order Deadlines.

The undersigned counsel have discussed the status of this matter, including outstanding discovery, and anticipated schedules. Counsel reviewed the discovery that will need to be completed as well as the depositions that may need to be taken.

Subsequent to additional discovery requests and responses, document production, and potential subpoena responses, the parties intend to take depositions. The Parties also believe that expert depositions will be necessary.

Additionally, Honest-1 anticipates seeking leave of the Court to file an amended Complaint, which complaint would name additional parties to the litigation.¹

The parties further expect that the additional time requested will provide greater flexibility and predictability given the existing press of business, holidays and planned vacations, and other scheduling.

Based on the parties' discussions and the foregoing, the parties jointly move to set the following deadlines:

Completion of all discovery	March 2, 2023
Plaintiff's expert report due	April 3, 2023
Defendants' expert report due	May 3, 2023
Expert discovery completed by	May 17, 2023

The parties believe that the above modifications reflect the expected scope of discovery and complexity of the issues in this matter.

Dated December 16, 2022.

¹ To the extent additional parties are added to the litigation, the parties may seek additional time to conduct discovery.

Respectfully Submitted,

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Counsel for Defendants

CERTIFICATE OF SERVICE

I, Peter Siachos, hereby certify that on December 16, 2022, I caused the foregoing to be filed electronically in the above-captioned action via the Court's CM/ECF system, which caused electronic copies to be served on all counsel of record.

/s/ Peter Siachos
Peter Siachos

